



Amy L. Alvarez  
District Manager  
Federal Government Affairs

Suite 1000  
1120 20<sup>th</sup> Street, NW  
Washington DC 20036  
202-457-2315  
FAX 202-263-2601  
email: alalvarez@att.com

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Via Electronic Filing

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TWB-204  
Washington, DC 20554

Re: Application by Verizon for Authorization To Provide In-Region, InterLATA  
Services in State of Virginia, WC Docket No. 02-214

Dear Ms. Dortch:

On Wednesday, September 11, 2002, Mark Keffer, E. Christopher Nurse, David Levy and the undersigned, all representing AT&T, met with Ben Childers, Ian Diller, Alvaro Gonzalez, Kimberly Jackson, Dennis Johnson, Richard Kwiatkowski, Scott Mackoul, Brent Olson, Uzoma Onyeije, Victoria Schlesinger, Kimberly Vanderslaar and Cecilia Seppings of the Commission Staff. The purpose of this meeting was to preview the reply comments AT&T will file today in the above-referenced proceeding. The attached presentation was distributed during the meeting and served as the basis for our discussion regarding directory listings.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

cc: Ben Childers Janice Myles  
Ian Diller Brent Olson  
Alvaro Gonzalez Uzoma Onyeije  
Kimberly Jackson Gary Remondino  
Dennis Johnson Victoria Schlesinger  
Richard Kwiatkowski Cecilia Seppings  
Scott Mackoul Kimberly Vanderslaar

AT&T

Verizon Virginia 271

September 11<sup>th</sup>, 2002

# VZ-PA Directory Listings

- Extensive DL problems in PA (PA 271 order ¶114-118)
- [T]here is no retail analogue to measure commercial performance, we will consider other evidence, such as independent third-party testing, in making our determination. (PA 271 fn 390).
- “KPMG reviewed a sample of directory listing orders and found that Verizon provisioned correctly 153 out of 156 orders, a 98 percent accuracy rate.” (PA 271 fn 390).

# Directory Listing & KPMG Test

- KPMG did not actually test Directory Listings directly, i.e., print directories.
- KPMG actually tested Directory Assistance directly, i.e., the 411 operator databases.

(VZ Sept 10 ex parte, KPMG Final Report and KPMG Master Test Plan)

- KPMG's finding is subject to assumption that errors in Directory Assistance mirror those in Directory Listing.

# Misplaced Reliance

- The reliance on KPMG testing of Directory Assistance, as a surrogate for testing Directory Listings is misunderstood.
- The reliance on KPMG testing of Directory Assistance, as a surrogate for testing Directory Listings is misplaced.
- The misplaced reliance in PA 271 ¶114 repeats itself in NJ 271 ¶156.
- If the DL process, and its improvements worked, there wouldn't be so many VA errors. (DOJ p. 7)

# Directory Listing and LVR

- Listing Verification Report (LVR) is not used by Verizon Retail.
- LVR process represents a cost **onset**, foist on CLECs, (DOJ fn 38) which VZ does not bear.
- The offering of an LVR does **not** shift quality responsibility from VZ onto the CLEC.
- High incidence of errors on LVRs is a discriminatory **process**, even if, uncompensated, the CLEC detects and corrects many errors prior to publication of the phonebook. (PA 271 ¶115-116)

# Reasonable Opportunity

- CLEC's LSR is the comprehensive directive to VZ to publish the Directory Listing.
- After VZ's confirmation of the LSR, VZ is totally responsible for correctly publishing as the CLEC's LSR directed.
- Given the automated nature of the data flow, a very high accuracy is reasonable—1:1,000, 99.9%
- Given the year-long cycle to correct DL errors a higher accuracy for DL than DA is reasonable.

# Incomplete Measurement

- There is no metric which measures the accuracy or completeness of the actual, printed publication.
- There is no metric which measures the end-to-end performance—from the CLEC's LSR through to the published directory.
- There is no apparent tracking of the VZ errors occurring from the LSR (thru the Service Order) to the VZ Information Systems (VIS) database.
- There is no apparent root cause analysis.



# Improvement in Measurement

- OR-6-04 relies on a random sample of 20 orders per day—resale and UNE. (DOJ fn 31, C2C Guidelines)
- Such sampling requires “independence” of the data, and is violated by “clustering” of the data. (VZ C2C Guidelines, Stat. Appendix).
- CLEC experience appear to be clustered.
- At minimum, OR-6-04 should be a mechanized review, based on 100% of CLEC orders.

# Current DL Process

- CLEC submit LSR with DL data to VZ.
- VZ converts the industry-standard LSR into multiple, internal Service Orders (SO).
- VZ confirms the LSR with the DL data.
- “The same SOs distributed to VIS to update white pages listings for CLEC customers are also distributed to VZ’s DA database...” (VZ 9/10 ex parte)
- LVR produced by VZ reflects database errors.

# Current Problems

- LSR correct submission does not reasonably produce accurate directory listings.
- No assurance that LSR confirmation will produce accurate directory listings.
- LVR error detection and correction doesn't necessarily assure accurate directory listing.
- No affirmative, proactive error detection and correction by wholesale supplier.